

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KEILEE FANT et al.,

Plaintiffs,

v.

THE CITY OF FERGUSON,

Defendant.

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Case No.: 4:15-cv-253 AGF

**JOINT MOTION FOR ENTRY OF STIPULATED ORDER AS TO CLASS END-
DATES AND DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiffs Keilee Fant et al. and Defendant the City of Ferguson in the above-captioned action, *Keilee Fant et al. v. The City of Ferguson*, Case No. 4:15-cv-253 AGF, hereby move for entry of the attached stipulated order governing class end-dates and resolving issues related to declaratory and injunctive relief.

The proposed stipulated order is attached as Exhibit A.

Dated: August 18, 2022

Respectfully submitted,

ARCHCITY DEFENDERS

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—and—

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Exhibit A

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Case No.: 4:15-cv-253 AGF

[PROPOSED] STIPULATED ORDER

Plaintiffs Keilee Fant et al. and Defendant the City of Ferguson (“the Parties”), through their respective counsel, have met and conferred regarding appropriate end-dates for the Rule 23(b)(3) classes and to resolve issues related to Plaintiffs’ claims for declaratory and injunctive relief raised by the Court in its June 28, 2022 Amended Case Management Order. ECF No. 524.

Based on their negotiations, the Parties stipulate to the following:

- The end-date for all five of the Rule 23(b)(3) classes certified by the Court in its Memorandum and Order (ECF No. 519) should be September 30, 2017 (the date on which the Ferguson jail closed).
- Within three business days of the Court’s entry of this order, Plaintiffs will voluntarily dismiss their claims for declaratory and injunctive relief on behalf of themselves and all classes.

The Parties stipulate as above with the following reservations:

- Defendant neither concedes that class certification is appropriate nor waives its rights with respect to further challenges, other than with respect to the stipulated end-dates; and
- Plaintiffs do not concede that Defendant has met its burden as to the alleged mootness of their prospective claims.

THEREFORE, IT IS HEREBY ORDERED, subject to the parties' above reservations, that the end-date for all five of the Rule 23(b)(3) classes certified by the Court in its Memorandum and Order (ECF No. 519) will be September 30, 2017, and within three business days of this order, Plaintiffs will voluntarily dismiss their claims for declaratory and injunctive relief.

[Remainder of page intentionally left blank; signature page to follow]

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: August 18, 2022

Respectfully submitted,

ARCHCITY DEFENDERS

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Attorneys for Defendant

Pursuant to Stipulation,

SO ORDERED this _____ day of _____, 2022.

HON. AUDREY H. FLEISSIG
UNITED STATES DISTRICT JUDGE